

To whom this may concern,

In the matter of the proceeding for change of rule for the Universal Service Fund for Rural Healthcare, Proceeding #02-60, Ripon Medical Center would like to submit the following comments:

- RMC fully supports the language for increasing Internet support from 25% to 50% funding. Internet Broadband is quite often the only choice for some rural hospitals.
- RMC Fully supports expanding “Eligible Health Care Provider” locations to include data centers, administrative offices, and skilled nursing centers.
- RMC supports modifying “Rural Area Definition for the Universal Service Fund” and base Rural Areas on the US Department of Agriculture B&I, which would include all areas outside ‘places of 50,000 or more people and their adjacent and continuous urbanized areas.’
- Support of Infrastructure build-out to allow Health Care Facilities network access of 10-20Megibits/second minimum connection speed with 85% of the cost paid by the program with the life span of the investment based on 15 years.
- Reject in total the requirement to make telecommunication funding contingent on meaningful use of electronic medical records. [The HHS “Meaningful Use” Criteria requirement should be addressed in Medicare/Medicaid EMR 2015 goals not the funding program. Rural hospitals are relying on broadband connections to connect to systems that will help them achieve this goal. They do not need to be penalized during the startup period. Also, rural health organizations often connect to many other systems to support their mission. These connections are independent of the MU requirements.